

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

Jennifer A. Connors,  
*Plaintiff,*

V.

Civil Action No. 2:10-cv-00094-wks

Dartmouth Hitchcock Medical Center,  
Mary Hitchcock Memorial Hospital,  
*Defendants.*

## **DEFENDANTS' TRIAL EXHIBIT LIST**

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A	Graduate Medical Education Red Book, Policy & Procedure Manual for Residents and Fellows 2008-09 (SAME AS PLAINTIFF'S EXHIBIT 5)	X	3/25/2014	✓
B	07/25/05 Letter from Jennifer Connors to Ronald L. Green w/Application for Graduate Training	X	3/25/2014	✓
C	10/27/05 Letter from Ronald Green to Jennifer Connors	X	3/25/2014	✓
D	Resident/Fellow Agreement of Appointment for June 26, 2006 through June 25, 2007 CONNORS 000064-66	X	3/25/2014	✓
E	4/20/06 Pre-Placement Health Questionnaire 000144-000150	X	3/25/2014	✓
F	05/27/06 Email from Edward Connors to Brenda Vale re: Hi!! An Update & Some questions from Jennifer 001641-001643	X	3/25/2014	✓
G	06/23/06 NH Board of Medicine Training License Certificate (SS # Redacted)	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
H	09/10/06 VT Dept. of Health Limited Temporary Physician License Application CONNORS 000856-000869	X	3/25/2014	✓
I	10/16/06 Memorandum from Ronald Green 000683-684	X	3/25/2014	✓
J	12/03/06 Email from Ronald Green to Jennifer Connors 000686	X	3/25/2014	✓
K	12/13/06 Email from Ronald Green to Jennifer Connors 000687	X	3/25/2014	✓
L	12/14/06 Email from Jennifer Connors to Ronald Green 000688	X	3/25/2014	✓
M	12/18/06 Email from Michael Sateia to Jennifer Connors	X	3/25/2014	✓
N	01/08/07 Email from Ronald Green to Jennifer Connors 000689	X	3/25/2014	✓
O	01/30/07 Email from Ronald Green to Jennifer Connors 000690	X	3/25/2014	✓
P	02/07/07 Email from Ronald Green to Jennifer Connors 000691	X	3/25/2014	✓
Q	02/28/07 Re: Block 9 CONNORS 000902-903	X	3/25/2014	✓
R	02/28/07 Summary of Items 000694	X	3/25/2014	✓
S	03/02/07 Email from Jonathan Schwartz to Ronald Green 000695	X	3/25/2014	✓
T	03/02/07 Email from Jonathan Schwartz to Bradley V. Watts CONNORS 000904-905	X	3/25/2014	✓
U	03/10/07 Memorandum from Ronald Green CONNORS 000906-907	X	3/25/2014	✓
V	03/21/07 Email from Jennifer Connors to Michael Sateia 001319	X	3/25/2014	✓
W	03/23/07 Memo re: Jennifer Connors 002149-	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
	2150			
X	04/03/07 Confidential Draft Re: Jennifer Connors, MD 000710-716	X	3/25/2014	✓
Y	04/07/07 Trainee Evaluation, Evaluator Jonathan Schwartz, Block 10 000243-245	X	3/25/2014	✓
Z	04/11/07 Email from Jennifer Connors to Michael Sateia 0001925	X	3/25/2014	✓
A1	04/11/07 Confidential memo from JC to RG, JK, HWP CONNORS 000280-284	X	3/25/2014	✓
A2	04/13/07 Email from Michael Sateia to Ronald Green 001927	X	3/25/2014	✓
A3	04/13/07 Letter from Ron Green to Jennifer Connors CONNORS 000215-216	X	3/25/2014	✓
A4	05/03/07 Letter from Ronald Green to Drs. John McLellan and Carolyn Murray CONNORS 000908-910	X	3/25/2014	✓
A5	07/27/07 Email from Carolyn Murray to Ron Green 001380	X	3/25/2014	✓
A6	07/27/07 Work Fitness Form 001379	X	3/25/2014	✓
A7	09/14/07 Remediation Plan for Dr. Jennifer Connors CONNORS 000911-912	X	3/25/2014	✓
A8	Resident/Fellow Agreement of Appointment, September 17, 2007 through January 6, 2008. CONNORS 000059-61	X	3/25/2014	✓
A9	12/21/07 Ronald Green Memo re: Meeting with Dr. Connors CONNORS 000913	X	3/25/2014	✓
A10	12/27/07 Email from Jennifer Connors to Ronald Green 000782	X	3/25/2014	✓
A11	12/31/07 Email from Lisa Lambert to Jennifer Connors 000988	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A12	01/01/08 Letter from Ronald Green to Eric Shirley CONNORS 000914-915	X	3/25/2014	✓
A13	01/08/08 Email from Jennifer Connors to Lisa Lambert 001103-001104	X	3/25/2014	✓
A14	Resident/Fellow Agreement of Appointment, January 7, 2008 through January 6, 2009 CONNORS 000056-58	X	3/25/2014	✓
A15	01/21/08 Email from Robert Racusin re: Meeting w/Jennifer Connors 1/21/08 CONNORS/RACUSIN 000009	X	3/25/2014	✓
A16	02/02/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 8 000274-000276	X	3/25/2014	✓
A17	02/27/08 email from Jennifer Connors to Lisa Lambert 000990	X	3/25/2014	✓
A18	03/01/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 9 000277-279	X	3/25/2014	✓
A19	03/06/08 Semi Annual Evaluation from Ronald Green to Jennifer Connors 001962	X	3/25/2014	✓
A20	03/18/08 Email from Lisa Lambert to Jennifer Connors 000993	X	3/25/2014	✓
A21	03/18/08 Email from Jennifer Connors to Lisa Lambert 000994	X	3/25/2014	✓
A22	03/20/08 & 03/25/08 Emails between Jennifer Connors and Lisa Lambert 000996-997	X	3/25/2014	✓
A23	03/29/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 10 000286-288	X	3/25/2014	✓
A24	04/26/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 11 000310-312	X	3/25/2014	✓
A25	06/19/06-04/02/08 Analysis of Trainee Comments 000298-301 (Ex. 8 to Deposition of Dr. Beck)	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A26				
B1	05/05/08 Note by Jennifer Connors 001006	X	3/25/2014	✓
B2	01/01/08-05/22/08 Analysis of Trainee Comments 000313-317	X	3/25/2014	✓
B3	05/24/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 12 CONNORS 000916-918	X	3/25/2014	✓
B4	06/03/08 Email from Jennifer Connors to James Platt	X	3/25/2014	✓
B5	06/03/08 Note - James Platt (Ex. 2 to Deposition of Platt)	X	3/25/2014	✓
B6	06/06/08 Letter from Jennifer to Dr. Lambert (Ex. 16 to Deposition of Lambert)	X	3/25/2014	✓
B7	06/26/08 Note – James Platt	X	3/25/2014	✓
B8	09/08/08 Note to file- Ronald Green CONNORS 000919-920	X	3/25/2014	✓
B9	09/11/08-10/30/08 Robert Racusin Emails CONNORS/RACUSIN 000001-8	X	3/25/2014	✓
B10	10/24/08 Email from Lanier Summerall to Andrew Pomerantz and Lisa Lambert (Ex. 6 to Deposition of Beck)	X	3/25/2014	✓
B11	10/24/08-12/19/08 – Email Collection (Marked as Exhibit 17 to the Deposition of Lisa Lambert) 000814-817, 000819, 001029-10300, 00103_, 001034-1036	X	3/25/2014	✓
B12	Craig Donnelly letter to Robert Racusin 000680-681	X	3/25/2014	✓
B13	11/07/08 Email from Bradley V. Watts to Ronald Green 000975	X	3/25/2014	✓
B14	11/07/08 Email from Lisa Lambert to Ronald Green 000815	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
B15	11/10/08 Email from Catherine Kutter to Robert Racusin CONNORS/RACUSIN 000016	X	3/25/2014	✓
B16	11/12/08 Email from Ronald Green to Lisa Lambert 000816-B (part of Lambert Deposition Exhibit 17)	X	3/25/2014	✓
B17	11/13/08 Email from Lisa Lambert to Robert Racusin CONNORS/RACUSIN 000021	X	3/25/2014	✓
B18	11/13/08 Racusin Notes CONNORS/RACUSIN 00010	X	3/25/2014	✓
B19	11/17/08 Email from Robert Racusin to Susan and Craig CONNORS/RACUSIN 00011	X	3/25/2014	✓
B20	11/17/08 Email from Ronald Green to Lisa Lambert 000816-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
B21	11/17-18/08 Email from Lisa Lambert to Ronald Green CONNORS 000923-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
B22	11/17/08 & 11/20/08 Redacted Medical Records (Ex. 8 to the Deposition of Beck)	X	3/25/2014	✓
B23	11/18/08 Email from Ronald Green to Keith Warren CONNORS 000921-B & CONNORS 000922-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
B24	11/03/08, 11/04/08, 11/07/08 & 11/18/08 Racusin Notes on input from faculty CONNORS/RACUSIN 000012-13	X	3/25/2014	✓
B25	11/19/08 Email from Ronald Green 001972	X	3/25/2014	✓
B26	11/19/08 Email from Ronald L. Green CONNORS 000720-000725 (Redacted 1 <sup>st</sup> paragraph from original production)	X	3/25/2014	✓
C1	11/20/08 Email from E. Lanier Summerall to Ronald Green CONNORS 000924	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
C2	11/20/08 Email from Lisa Lambert to Ronald Green	X	3/25/2014	✓
C3	11/20/08 Email from E. Lanier Summerall to Ronald Green CONNORS 000926-C & CONNORS 000925-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
C4	11/20/08 Email from Jennifer Connors to Robert McLellan CONNORS 000927-B & CONNORS 000926-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
C5	11/20/08 Memo from RG CONNORS 000928-929	X	3/25/2014	✓
C6	11/21/08 Email from Lisa Lambert to Ronald Green CONNORS 000927-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X	3/25/2014	✓
C7	10/24/08 – 11/21/08 – Item 12 - Collection of Emails attached to RG's submission to Fair Hearing Committee CONNORS 000921-927	X	3/25/2014	✓
C8	05/01/07, 11/25/08 & 12/04/08 Occupational & Environmental Medicine Notes 001332-001333	X	3/25/2014	✓
C9	12/08/08 Note – James Platt	X	3/25/2014	✓
C10	12/19/08 Email from Jennifer Connors to Ronald Green 0001036-B & 0001035-A (part of Lambert Deposition Exhibit 17)	X	3/25/2014	✓
C11	12/22/08 Email from Jennifer Connors to Lisa Lambert 000979-A (part of Lambert Deposition Exhibit 17)	X	3/25/2014	✓
C12	12/23/08 Email from Lisa Lambert to Ronald Green 0001035-B & 10036-A (part of Lambert Deposition Exhibit 17)	X	3/25/2014	✓
C13	01/02/09 Note to file from Ronald Green CONNORS 000930	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
C14	01/23/09 Email from Jennifer Connors to Bradley Watts 000985	X	3/25/2014	✓
C15	01/28/09 Letter from Ronald Green to Jennifer Connors CONNORS 000206-210	X	3/25/2014	✓
C16	1998-2009 Connors History (Exhibit 19 to the Deposition of Connors)	X	3/25/2014	✓
C17	02/02/09 Note to file from Ronald Green CONNORS 000934	X	3/25/2014	✓
C18	02/02/09 Notes – James Platt	X	3/25/2014	✓
C19	02/12/09 Letter from Jennifer Connors to Sara H. Koury 001391	X	3/25/2014	✓
C20	01/07/08-02/24/09 Jennifer Connors Milestones	X	3/25/2014	✓
C21	06/11/09 Memorandum from Ron Green to DHMC Fair Hearing Committee Members (w/o attachments) CONNORS 000895-901	X	3/25/2014	✓
C22	06/11/09 Memorandum from Ron Green to DHMC Fair Hearing Committee Members (w/attachments) CONNORS 000895-934	X	3/25/2014	✓
C23	Graduate Medical Education – Fair Hearing Process Confidential Decision 001937-0001940	X	3/25/2014	✓
C24	09/23/09 Letter from Jennifer Connors to University of Texas	X	3/25/2014	✓
C25	09/25/08 Personal Statement – Jennifer Connors to University of Texas Medical School at Houston 002431-002433	X	3/25/2014	✓
C26	10/19/09 Letter from Gifford Medical Center to Jennifer Connors 002589-002595	X	3/25/2014	✓
D1	12/17/09 Jennifer Connors' Application for Physician Licensure VT B.O.M. 46-55	X	3/25/2014	✓
D2	Explanation of Activities to application to Vermont Board of Medical Practice VT B.O.M.	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
	72			
D3	Addendum 1, Premedical Education, to application to Vermont Board of Medical Practice VT B.O.M. 75	X	3/25/2014	✓
D4	06/03/10 Email from Jonathan Covault to Jennifer Connors 002620-2621	X	3/25/2014	✓
D5	06/07/10 Fletcher Allen Health Care, Inc. Conditions of Appointment & Training for House Staff 2010-2011 002709-2731	X	3/25/2014	✓
D6	Lebanon College Letter to Jennifer Connors re: new position at Lebanon College 002606	X	3/25/2014	✓
D7	08/14/10 Email from Jonathan Covault to Jennifer Connors	X	3/25/2014	✓
D8	02/25/11 Report of Sheldon Benjamin, M.D.			
D9	CV of Sheldon Benjamin, M.D.	X	3/25/2014	✓
D10	Notes of Sheldon Benjamin, M.D. (Exhibit 3 to the Deposition of Benjamin)	X	3/25/2014	✓
D11	2010 Tax Returns WLF P3250 - P3241	X	3/25/2014	✓
D12	2011 Tax Returns WLF P3258 - P3268, P 3242-3243, P 3282	X	3/25/2014	✓
D13	2012 Tax Returns WLF P3269 – P3278, P3244-3245	X	3/25/2014	✓
D14	2013 Earnings Statements P3279-P3281, P3246, P3248, P3247P3249	X	3/25/2014	✓
D15	Curriculum Vitae – Ronald Green, M.D.	X	3/25/2014	✓
D16	Curriculum Vitae- William Chandler Torrey, M.D.	X	3/25/2014	✓
D17	Michele King notes re: Fair Hearing MK 1-4	X	3/25/2014	✓
D18	The Psychiatry Milestone Project, a Joint Initiative of The Accreditation Council for	X	3/25/2014	✓

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
	Graduate Medical Education and The American Board of Psychiatry and Neurology			
D19	11/24/08 JC Notes re: Supervision w/LL. JC/FAIR HEARING 185	X	3/25/2014	✓

Law Offices of  
Sullivan & Hollis, PLLC.  
Concord, N.H. 03302